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September 2, 2003

TO: EPA Solid Waste Division

SUBJECT: Recovered Materials Advisory Notice IV for Nylon Carpet

The Carpet and Rug Institute appreciates the opportunity to comment on the proposed designation of nylon carpet in EPA's Comprehensive Procurement Guidelines IV. As you are well aware, this has been a very contentious issue within the carpet industry. CRI's attempts in its previous comments tried to resolve these differences and resulted in a submission that was unsatisfactory to all parties.

We at CRI have been working diligently to find common ground from which we can provide a unified industry position that is meaningful to the process. Unfortunately, we have not been able to do so. We have been able to narrow the differences into two positions: (1) a majority position and (2) a minority position. The majority position is that nylon carpet should not be included in the proposed CPG IV and the minority position is that CPG IV should include nylon as a product category.

The one area in which we have total industry consensus is that this industry is fully committed to finding ways to make our products sustainable and will work diligently together to find solutions. The CRI and individual manufacturers have expressed a desire to immediately enter into a model Extended Producer Responsibility (EPR) or Product Stewardship Program. Recycled content combined with current best practices in sustainable design and lifecycle analysis will provide a comprehensive view of EPP. This type of public/private program has other precedents between government and industry that do not include CPG designation. The EPA Computing Center and the entire EPA campus in Raleigh-Durham, NC, have received numerous awards for a multidiscipline approach to environmental stewardship. The advantage of the stewardship approach is the opportunity for EPA to partner with a highly motivated and active carpet industry with a solid record of sustainable development. It can be a positive model for other product stewardship programs.

CRI Minority Comments
In Support of the CPG Nylon Carpet Designation

We appreciate the opportunity to comment on the proposed CPG IV for recycled content nylon carpet. We represent about 10% percent of the total carpet market and, perhaps more importantly, over 30% of the current Federal carpet market. While a designation doesn't require that all or a majority of an industry can meet the designated levels, we hope that the support for the proposed CPG by such a significant

representation of the relevant carpet market should be reassuring to EPA. We expect that a minority within an industry typically drives most innovation, at least initially. A meaningful designation would provide a necessary incentive for further innovation.

The companies in support of the designation, Interface and Tandus (Collins & Aikman Floorcoverings or C&A), include five major carpet brands: Interface, Bentley/Prince Street, C&A, Monterey, and Crossley, providing a wide range of products including both traditional and structured back performance 12-foot broadloom, as well as tile and six-foot broadloom. These brands represent knowledge and expertise in all product types that are relevant to Federal purchasers. Unlike the "majority" of carpet manufacturers, we are not significant participants in the residential market place.

In summary, we strongly support EPA's revised "Recommended Recovered Materials Content Levels for Nylon Carpet." We have only minor suggestions. We commend EPA for patience and for diligence in sorting through wide-ranging and often-conflicting comments. We feel that the new recommendations recognize the availability of recovered content materials and also are set at levels high enough to have a significant environmental impact.

In answer to each of the specific questions EPA has asked to be addressed:

1. **Recovered materials content range:**
   We support the recycled content levels that EPA recommends. At least one of the companies responding (Collins & Aikman), while easily able to meet the requirements in tile products, can currently guarantee only 5% post-consumer in its 6-foot performance broadloom products. We recommend, however, that the 8% recommended level for post-consumer content be adopted. Collins & Aikman comments that this will provide further incentive to increase the post-consumer content of its broadloom products.

2. **Delineation of carpet products:**
   We feel that EPA has appropriately delineated carpet products. Our assumption is that performance broadloom would include both 6-foot and 12-foot roll products with structured backings. While 6-foot roll products are not always categorized as broadloom products (they are sometimes included in the modular category), to include 6-foot and 12-foot under the same category is appropriate based on the construction of these products. Additionally, GSA includes both 6-foot and 12-foot products under the same category (FSC Group 72, Part 1, Section A, SIN 31-301).

3. **Availability of post-consumer and total recovered content nylon:**
   Four billion pounds of post-consumer carpet enter the waste stream each year. While only a small portion of it is being recycled at this time, a sufficient quantity is being recycled back into carpet to justify this designation, and a designation would certainly increase the amount of carpet being diverted. One hundred percent of C&A's modular tile production contains recycled content at the levels recommended, and C&A has recently announced the commercialized availability

of recycled content 6-foot performance broadloom carpets (although at less than 8% post-consumer as explained above). Interface also manufactures modular tiles and 6-foot performance broadloom carpets with recycled content at the proposed levels. We are aware of additional efforts in the carpet industry. We feel that an EPA designation will spur additional product offerings.

Consistency with Environmental Goals:
Designating nylon carpet with recycled content is not only consistent with broader goals of environmental preferability; it is the essential element in many other environmental improvements that have occurred. Indeed, while a primary goal of designating nylon carpet is to reduce the amount of carpet in the waste stream, additional environmental benefits occur specifically because of recycling, such as energy reduction, source reduction, waste reduction, and emissions reduction. While some may resist recycling because it is not necessarily the easy way forward, those who actually have active recycling programs have demonstrated overwhelmingly that these programs contribute environmental benefits well beyond the direct impact of recycling.

A theory has been advanced in various forms that a designation of recycled content carpets would somehow be a barrier to developing or purchasing products that have environmentally preferable attributes (in addition to recycled content). While this is an interesting theory, the proposed designation isn't based on theoretical products but on actual examples that EPA has found in its research. The facts fully disprove this theory as it relates to this designation. The facts show that recycled content positively and dramatically impacts many environmental attributes such as water, air and green house gas emissions as well as embodied energy and energy conservation.

We certainly believe that the overall environmental performance of products being considered should be evaluated before a designation is made. EPA has always taken a broad view in making these evaluations, and has based those evaluations on the facts available, not on unspecific and unsupported generalities. Although designations are based on recycled content, EPA has demonstrated responsibility in making these designations, and has done so with all aspects of a product's environmental impact considered.

Fortunately, strong scientific proof exists to support EPA's proposed designation, and to disprove any assertion that the proposed designation would not recognize products with the most desirable (preferable) environmental characteristics. The National Institute of Standards and Technology (NIST) has developed a software program, Building for Environmental and Economic Sustainability (BEES) 3.0, to evaluate the overall environmental impact of selected building products based on Life Cycle Analysis (LCA). The BEES program was created with support from the U.S. EPA's Environmentally Preferable Purchasing Program. BEES was developed as a tool to assist the Federal procurement community in carrying out Executive Order 13101, and to provide EPA with a means of evaluating products being considered so that unintended consequences, such as selecting products

with recycled content but otherwise not preferable, would be avoided. BEES 3.0 contains LCA analysis for the environmental comparison of current commercially available carpets, using twelve important environmental impacts.

In a BEES LCA, the multiple environmental impacts are combined into a single environmental performance score using relative importance weights. When products within a product category (i.e.; carpet) are compared to each other, products having lower overall scores have lower overall environmental impact. Since *Environmentally preferable* is defined as *"products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose,"* and since BEES evaluates these impacts on a product-by-product basis, then products having lowers BEES "scores" would logically be said to be the most environmentally preferable. Multiple carpet companies submitted a wide variety of carpet types for the evaluation, including five products submitted by three of the carpet companies who have joined in opposition to the designation. Additionally, nylon faced, recycled content vinyl-backed carpets of the type proposed for designation in CPG III, and being considered for designation under CPG IV, were also submitted. The recycled content vinyl-backed products had by far the lowest scores and, therefore, the lowest overall environmental impact, compared to other commercially available structured back nylon products submitted. The carpet life cycle comparison in BEES demonstrates that a designation of the proposed products would support the purchase of environmentally preferable products and would in no way deselect products with better or even similar attributes.

A designation would be fully consistent with CARE. As stated on its website, "CARE focuses on developing carpet reclamation and recycling methods." The CARE program was initiated by several states with the specific purpose of reducing carpet from burdening landfills. The "Aspirational Goal" of CARE, as stated in the Memorandum of Understanding (MOU) signed by most of the carpet industry along with multiple states and NGO's, is "..the eventual elimination of land disposal, incineration, and incineration with energy recovery of post-consumer carpet and establishing escalating goals for recycling and reuse consistent with resource conservation." While CARE recognizes the importance of broad environmental goals, it is clear that recycling is the impetus of the MOU.

4. **Inclusion of traditional broadloom carpet:**
We, too, are concerned about the sufficient availability of traditional broadloom carpets with recycled content to justify a designation of that product type. At best, only a very small level of post-consumer recycled material, if any, could be reliably expected, diluting the significance of a designation. We feel that designating at a very small level or with no post-consumer content would give the false impression that purchases of these products had a meaningful positive impact. We also are concerned that Federal purchasers would be in a position of trying to purchase products with a very limited availability. Also, the product

categories currently being recommended represent a very significant portion of Federal purchases, perhaps even a majority.

We also feel, however, that the prospect of a designation would provide a motivation to develop supplies of recycled content traditional broadloom products. We suggest that EPA consider establishing a designation for broadloom carpets that will be phased in, beginning perhaps in 2004. This would allow time to develop products that could meet the goals, and would also provide a significant incentive to manufacturers to provide these products.

Other notes:

We suggest that some uses of fillers should not be excluded. For example, some currently operational processes use portions of recovered carpet and others use the whole carpet. In either case, filler exists in the recovered carpet and, therefore, is incorporated into the recycled carpet. We feel that the filler, in this case, is consistent with the goals of EO 13101 and RCRA 6002, as it diverts carpet from the waste stream and back into carpet. Other similar examples may exist.

While there have been many challenges to this designation, it is our shared experience that EPA has proven to be consistent and impartial, and has based decisions on sound scientific evidence. Past CPG designations have had a positive impact in other industries, even if there was not unanimous support for those designations within the industries. It is our opinion that the designation being proposed will be beneficial to our environment, our customers, and ultimately to the industry itself. While we regret not being able to come to a consensus position, we feel the submission of the two opposing view points represents the best thinking within the industry and constitutes a solid basis for EPA to make a fact based decision on inclusion or deletion of nylon carpet as a product category in the upcoming CPG IV.

(End Minority Opinion)

CRI Majority Comments
on the Proposed Nylon Carpet CPG Designation

The Majority group within the CRI represents over 90% of annual U.S. carpet production. Nylon is the most popular fiber type in the $12 billion U.S. carpet market. The industry supporters of the opposing position are primarily producers of PVC-backed carpet tile and six-foot roll goods with nylon fiber. The category designations proposed in the CPG are indicative of post-consumer (PC) and recovered material (RM) capabilities in these PVC product types. If EPA proceeds with the nylon carpet designation, it will exclude other nylon carpet product categories which have significant government customer bases that receive, and depend upon, federal funds.

The volatile history to-date, and continued uncertainty, regarding availability of PC and RM waste streams used in carpet has been recognized by EPA with this "last look" comment period. Much has changed since the original research EPA undertook into nylon carpet designation. We believe the facts associated with current carpet recycled content capabilities do not support the CPG designation of nylon carpet. The following comments are submitted for the EPA's consideration in the spirit of goodwill, and benefit toward environmental sustainability.

The following CRI members expressed a desire to be individually listed as supporters of the Majority position: bp Amoco, Blue Ridge Carpet, Dow. DuPont, BASF, J & J Industries, Lees Carpets, Solutia, Mohawk, Mannington, Milliken, Mallard Creek Polymers, Omnova Solutions, Shaw Industries, the SB Latex Council, and Synthetic Industries. These manufacturers produce too many brands under their various divisions to mention here, but the information is available upon request.

1). Post-consumer (PC) and Recovered Materials (RM) Content Ranges. We strongly urge the EPA to recognize the effects of reduced availability of recovered materials over the past 24 months, and current technological limitations outside the vinyl-backed carpet categories. We would like to see the EPA forego the CPG process in favor of a broader product stewardship program built upon recognized Environmentally Preferred Product (EPP) attributes and/or lifecycle assessment. It is our belief that the CPG will narrow the carpet selection criteria to the single attribute of recycled content at the expense of other equally or more environmentally beneficial products based on exciting new material and processing technologies.

The majority does not support the materials content ranges in the proposed categories. Ranges of 8% to 25% post-consumer content are supported by only two manufacturers making PVC backed carpet tile and six-foot rolls, C&A and Interface. Lees Carpets, maker of the only thermoplastic 12-foot broadloom backing with recycled content, does not support the CPG designation. The 30% to 60% designation in recovered material is out of reach for nonPVC backed roll carpets due to low face weight to backing weight ratios in broadloom carpets. Even if 100% recycled content nylon was available in sufficient quantity, the RM percentage for most carpets would not reach 30% and would have even greater difficulty reaching a PC level of 8%. Lowering the required levels will not make PC material any more available. The Majority believes that establishing low recycled material content levels would be more effective within the broader outline of an EPP product stewardship program.

The proposed CPG designation ranges will restrict nylon carpet types and recycled content sources on an unprecedented scale. The proposed CPG will create an atmosphere that does not encourage the purchase of EPP-based nylon carpet products, and places unreasonable restrictions on approved sources of PC recycled material. The proposed sources are limited to "old carpets" as it currently stands (NODA footnote #5). No noncarpet waste streams, such as low-melt polymers from other industries, will be recognized under the proposed CPG.

EPP products recognized by EPA and other government programs and awards may be excluded from "endorsement" by the narrow focus of the proposed CPG. Carpet industry members have historically participated in EPA programs and many carpet producers have won government sponsored environmental awards. Under the proposed CPG, products that have won awards that include recycled content and other EPP criteria may not qualify for government purchase under the CPG's sole focus on recycled content. In our opinion, EPA has no intent to penalize sustainable EPP products that do not contain recycled content, but the designation will have that effect.

Designation *"would exclude materials that serve as fillers and binding agents (e.g.; coal fly ash) as counting toward the recovered material content requirement"* (NODA footnote #4). This proposed exclusion is at odds with EPA's own Coal Combustion Products Partnership (C2P2), promoting voluntary waste reduction through the beneficial use of coal combustion products. Concrete is a major contributor to USGBC's LEED Building Standards because of the RM content imparted by coal fly ash (CFA). Carpet use of CFA will not adversely affect availability of CFA for use in concrete. CFA industry data shows that carpet incorporates CFA benefits from improved tuft bind, delamination strength, dimensional stability, and backing strength. The Majority encourages and supports the positive progress in CFA fillers for carpet production under the C2P2 program.

Carpet components will need to find their way into noncarpet products until sustainable carpet redesign efforts allow greater PC sustainable carpet component recycling. Most recovered carpet materials today are used in noncarpet applications like fiber pad, synthetic lumber, nylon board sheeting, and molded products. Even if sustainable thermoplastic materials were developed and widely substituted for thermoset backings today, it would take over ten years to cycle through and uplift the majority of the older thermoset backed carpets. Current technologies simply will not allow these PC carpet waste streams to go back into carpet today. The environmental impact reduction goals of the CPG may be negated by the insertion of recycled materials into carpet backings through unintended consequences, such as heavier weights to increase recycled mass, that do not increase performance and increase solid waste when they do go to landfills.

2). Delineation of carpet products (e.g.; broadloom vs. modular/tile, and traditional vs. performance broadloom).

Traditional broadlooms are generally considered to be in the SB latex category that dominates the industry. The distinction made between "traditional" and "performance" broadloom is an incorrect characterization that could lead a purchaser to assume traditional broadloom is not a high performance product. In fact, some of the highest tuft-bind products on the market today are SB latex backings with low filler loads. In any case, no broadloom should be designated in the CPG because broadloom backings (12 to 15 ft.) cannot be recycled, or generally contain recycled content (with the notable exception of the Lees product). Almost all broadloom backings (12 to 15 ft.) are water-based emulsions of various polymers that have the same limitations.

Six-foot performance rolls, included under the "performance broadloom" category provide an unrealistic view of true broadloom recycled content capabilities. These six-foot vinyl backed rolls, virtually identical to vinyl tile constructions, are the rationale for proposed "performance" broadloom PC and RM percentages that match those of proposed "performance modular." Broadlooms with thermoset backings far exceed vinyl roll sales and cannot be remelted like PVC. Broadlooms have conventionally been defined within the industry as roll carpet ranging from 12 to 15 feet in width. Identical percentage designations for broadloom and modular will assure that few "traditional" or "performance" 12- to 15-foot broadlooms meet the CPG requirements, removing almost all commercial and residential broad width carpets from consideration.

The separate designation of refurbished modular is a small and stable market where only one manufacturer has a program of note. By definition, only the dyes and topical sprays are new additions to the refurbished carpet tile products produced by Majority view supporter, Milliken Carpet.

3). Quantifiable data to address the availability of post-consumer and total recovered material content nylon for use in nylon face fiber and/or backing.

Low capacity for post-consumer (PC) carpet nylon will not provide adequate PC nylon for CPG markets. Evergreen Nylon Recycling, in Georgia, shut down in late 2001, removing 100 million pounds of PC nylon monomer from the market. In September of 2003 Polyamid 2000's nylon depolymerization unit in Germany will also cease operations due to bankruptcy, taking down another 25 million pounds of PC nylon monomer. That leaves only the Honeywell unit in Canada with an annual capacity of approximately 2 million pounds to provide PC recovered nylon monomer. This limited capacity does not begin to approach the PC requirements of the proposed nylon carpet CPG. The industry has seen a reduction of over 95% of the depolymerization capacity in PC nylon over the last two years. It is important to recognize that economic, technical and/or environmental variables have limited the success and expansion of PC nylon recovery and are driven in large part by the very high feedstock quality required in the extrusion of fibers.

Post-consumer recovered carpet materials are not readily available for use in carpet, with the limited exception of PVC (vinyl) backing. The fact that PC nylon is vastly diminished in availability compared to two years ago is good reason for EPA to reconsider designation of nylon carpet. PC material availability for backing is also low due to reliance on high-performance, low-cost thermoset backing polymers. PVC tile and six-foot backings are thermoplastics that may be remelted and recycled, but are limited in carpet use. PVC, polyurethane, and other backing \polymer producers are in favor of the Majority position, with the exceptions of C&A and Interface.

Industry capacity for PC nylon and other materials as referenced in carpet promotional literature is generally accurate but limited in scope. Rapid changes in recycled material availability has rendered many industry marketing brochures obsolete,

but there is no way to effectively remove them all from circulation. The legal use of the FTC mass balance concept concentrates recycled content into limited carpet product collections. The overriding principle of mass balance is that credits claimed in finished carpet products cannot exceed credits entering the manufacturing system. A similar principle is used for Green Energy. It is in no way deceptive to highlight these limited product collections. Literature focused on the limited scope of recycled nylon products does not address all material volume required to make all carpet products. EPA will draw the wrong conclusion regarding PC and RM availability if they rely solely on these literature pieces and make assumptions regarding wider availability.

Most "early-adopters" of the BEES tool have done so for self-improvement, not for purposes of competitive comparison. If EPA wishes to rely on BEES data, the industry will respond with updates to data that is, in some cases, three years old. The NIST specifically states that it "does not necessarily endorse the views expressed or facts presented on the [web] site, [and] further, does not endorse any commercial products..." (FTC Part 260, Guides For the Use of Environmental Marketing Claims, specifically states in footnote 2). These guides do not currently address claims based on a "lifecycle" theory of environmental benefit. The Commission lacks sufficient information on which to base guidance on such claims. (Authority: 15 U.S.C. §§ 41-58).

4). Is inclusion of nylon carpet in the CPG inconsistent with environmental goals established in other industry environmental programs such as CARE?

Recycled content requirements in the CPG do not adequately address the problems of stable recycling infrastructure as envisioned by CARE. Majority industry members of the Carpet America Recovery Effort (CARE) are concerned that the CPG will make CARE's broad-based landfill diversion goals and recovery infrastructure development more difficult to achieve due to the CPG focus on carpet-to-carpet recovered material. Large amounts of PC carpet waste will only be diverted from U.S. landfills when useful carpet and noncarpet products as well as stable markets are designed and developed for utilization of carpet waste. Over 4.5 billion pounds of carpet go to U.S. landfills annually. Very little of this carpet waste is anticipated to be diverted for recycling back into carpet as envisioned by the CPG.

The success of CARE will depend on the development of noncarpet recycling applications. The nylon carpet CPG is inconsistent with the previous polyester carpet fiber designation that recognizes the need to cross industry boundaries. The EPA is a charter member of CARE and fully supportive of its noncarpet recycling pathways. Polyester carpet fiber that comes from disposable polyester drink bottles is not recovered and made into more polyester carpet fiber again under the polyester designation. Polyester carpets are largely landfilled or incinerated. What the carpet industry needs today is government-supported markets for the noncarpet products that are being developed from "old carpet" waste streams that simply cannot be used in carpet again due to the technical limitations of thermosets. The Majority strongly urges the EPA to support development of products that utilize carpet waste as the carpet

stewardship program we propose steadily moves the carpet industry toward sustainable carpet materials.

The CRI and individual manufacturers have expressed a desire to immediately enter into a model Extended Producer Responsibility (EPR) or Product Stewardship Program. The CPG designation could impede stewardship negotiations by creating an atmosphere of compliance rather than cooperation. Due to the regulatory power of the designation, purchasers are required to justify the reasons they have chosen not to specify a designated product through a process called a "determination." This may place a burden of paperwork, examination, and delay that the purchaser is unwilling to accept. Manufacturers will invest limited resources into concentrating available recycled material into limited standard product collections, if technology allows, that exist solely to comply with the CPG requirements regardless of other EPP considerations in order to preserve their government sales. The resources available to pursue broader EPP environmental goals will be diminished.

The CPG designation also seems to conflict with the Pilot Project Approach on the Use of Nongovernmental Entities. This program seeks to encourage environmental standards setting organizations, environmental labeling programs, third-party certification programs, and others to demonstrate how these entities can support federal environmentally preferable purchasing efforts. The carpet industry is in the midst of setting environmental standards through a variety of avenues. If a carpet falls short of the recycled content requirements of the CPG, but excels in other EPP categories when compared to a product that only offers recycled content as an EPP attribute, the CPG will require selection of the single-attribute recycled content product. The inflexible levels of PC and RM will forever favor CPG compliant products. The CPG could mandate a product with a single environmental attribute at the expense of a product with less total environmental impact, and limit the effectiveness of EPP-based standards programs

It is reasonable to ask that no nylon carpet be designated under the CPG to facilitate negotiations on a product stewardship proposal. We believe that a CPG designation should be the result of an undisputed recognition of environmentally beneficial recycled content levels that also allow other EPP attributes to play a significant role in purchasing decisions. In nylon carpet, we believe recycled content designation would discourage the purchase of reduced environmental impact nylon carpet products with other sustainable EPP attributes. The CPG will forever remain an option for the EPA to pursue if we squander the opportunity to bring balance to the influence of many important EPP attributes to government carpet purchases.

5). Should the agency recommend recycled content for traditional broadloom carpets? If it does, should both post-consumer and total recovered content recommendations be made?

The Majority feels that any CPG recommendation of recycled content in, or designation of, nylon carpet of any type is undesirable for an industry that continues to voluntarily lead the building industry in progressive approaches to

sustainability. We believe that the CPG designation may only serve as a barrier to a more comprehensive environmental solution to landfilling of solid waste, human and ecological health and safety, reduction of embodied energy, the development of lasting value recovery infrastructure for carpet, and incentives to develop new materials and processes that will create a sustainable carpet future.

The CPG may create confusion over the "preferability" of designated vs. nondesignated products. The proposed nylon carpet CPG may create confusion by dividing nylon broadloom carpet into "traditional" and "performance" categories. The CPG designation of "performance" products could imply that "traditional" products are somehow not equal in quality or suitable for purchase. This is clearly not the intent of EPA, but a consequence of marketing practices that would perhaps specify "over-constructed" performance backed carpets into legitimate "traditional" carpet end-uses.

6). Other topics the Majority wishes to address.

The Majority recommends that carpet should not be designated by the CPG RMAN process due to the RCRA 6002 singular focus on recycled content. With recent developments in technology and the greater knowledge attained since the beginning of the designation process, it is commendable that EPA has taken this "last look" at nylon carpet before accepting a designation that is no longer reflective of nylon carpet's sustainable attributes, as acknowledged in EPA's EPP guide, "Greening Your Purchase of Carpet."

There is a potential conflict between the effects of the proposed nylon carpet CPG designation and the leading hierarchical goal of EO 13101 - pollution prevention. Recent first generation carpet technologies can prevent pollution without using recycled content at inception. The preamble of EO 13101, *"It is the national policy to prefer pollution prevention, whenever feasible. Pollution that cannot be prevented should be recycled; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner. Disposal should be employed only as a last resort" (Part 1 – PREAMBLE, Section 101),* acknowledges the need to first consider pollution prevention. The CPG designation process does not address the EPP definition also outlined in EO 13101 as it relates to human health and reducing impacts on the environment. *"Environmentally preferable" means products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose. This comparison may consider raw materials acquisition, production, manufacturing, packaging, distribution, reuse, operation, maintenance, or disposal of the product or service. (PART 2— DEFINITIONS. Sec. 201).*

The CPG does not recognize carpet industry efforts in product sustainability. The EPA publication, "Greening Your Purchase of Carpet," presents five guiding principles to help in making environmentally preferable carpet choices: 1) include environmental considerations as part of the normal purchasing process, 2) emphasize pollution prevention early in the purchasing process, 3) examine multiple environmental attributes throughout a product's lifecycle, 4) compare relevant environmental impacts when

selecting products, and 5) collect and base purchasing decisions on accurate and meaningful information about environmental performance. While the carpet industry has been a leader in regard to these five principles, the proposed CPG does not provide for their consideration.

In summary, the Majority view is one of partnership and cooperation with EPA on a broadly based program of product stewardship that will include recycled content as one of many EPP attributes associated with the environmental impact of carpet. Setting recycled content levels of any kind through the CPG process would be premature. We recommend that the industry work jointly with EPA to determine the best mix of flexible EPP criteria to present to government purchasers that is truly reflective of current sustainable practices.

(End Majority Opinion)

Any previous comments by signatory companies are subordinate to these comments and are intended to minimize the need for additional comments from CRI member companies in the hope that it will make EPA's task easier.

We wish to thank EPA for the patience and fortitude it has displayed during this process.

Sincerely,

Werner H. Braun
President

NOTE: If you need clarification or more information regarding this submittal, please contact Frank Hurd at the address listed in the letterhead or call Mr. Hurd at 706/271-5576.